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VIA ECF

Hon. Judge J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Rivera, et al. v. 787 Coffee LLC, et al.

Case No. 1:22-cv-01596

Dear Judge Oetken:

This office represents Defendants in the above referenced matter. I submit this letter, and with the consent of Plaintiffs, to request an extension of time to complete all fact discovery including completion of the parties' depositions by the end of September 2022; and file the parties' joint status letter one week after the close of all fact discovery. Counsel for Defendants necessitated making such request as she has recently experienced an urgent family emergency and the circumstances require the Counsel to make an out-of-country trip until the beginning of August 2022.

Pursuant to Your Honor's Individual Rules of Practice regarding extension requests, we state as follows:

- (1) the original due date to complete all fact discovery including completion of the parties' depositions was September 8, 2022 and the new date requested is September 30, 2022; and the parties' joint status letter was due on or before September 15, 2022 and the new date requested is on or before October 7, 2022;
- (2) this is the first request made to the Court to extend the time to complete all fact discovery and submit a joint status letter; and,
- (3) this request is made on the consent of all parties herein.

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We appreciate the Court's time and attention in this matter.

Respectfully Submitted,

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By: /s/ Diana Seo

Diana Y. Seo, Esq.

Attorneys for Defendants

cc: All counsel of record (via ECF)